

# PUBLIC SUBMISSION

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Summary of Benefits and Coverage and the Uniform Glossary

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Summary of Benefits and Coverage and Uniform Glossary

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## General Comment

Allow greater flexibility relative to layout, colors and distribution so employers can coordinate these materials with existing communications that employees recognize and trust. Few employers currently use the proposed landscape format or print materials in color. While some employers print materials, other find that online distribution better meets the needs of their employers.

Define the requirement that modifications be communicated 60 days in advance to apply only to mid-year changes. Particularly in the small group market, few employers make annual plan design decisions more than 60 days in advance of each new plan year. Applying the 60-day requirement to annual changes would require major modifications in the sales and underwriting cycle for smaller employers.

Delay implementation for 18 to 24 months to give insurers, brokers and self-insured plans time to make the changes operational.

Provide more flexibility in selecting the medical scenarios illustrated in the cost comparisons. Include scenarios that are more representative of the costs for a typical employee who has primarily doctor's office and urgent care visits. There could be potential legal liability for the costs displayed on documents when an individual's experience differs from the illustration.

Simplify the requirement for CFL illustrations or provide a uniform tool for generating the cost estimates. No tool currently exists to generate plan-specific CFL calculations.